

REMARKS

Reconsideration and allowance of the present application are respectfully requested. Claims 1-4, 7-11, 13-15, 18-24, 26, 32-35, 39-43, 49, 51, 52 and 55 are currently pending in this application.

Regarding the Objection to the Declaration

The Office Action objected to the declaration, presumably because it makes reference to "35 CFR 1.56(a)" rather than the entire rule, i.e., "37 CFR 1.56." A PTO model form (PTO/SB/01 (8-03)) recites, in part, that Applicants "acknowledge the duty to disclose information which is material to patentability as defined in 37 CFR 1.56." It is submitted that the original declaration, which cites 35 CFR 1.56(a), is sufficient, as 37 CFR 1.56(a) sets forth the basic duty of disclosure owed the Patent Office by Applicant, and a proper interpretation of 35 CFR 1.56(a) would necessarily draw into consideration the other parts of the rule. For instance, 35 CFR 1.56(a) recites, in part, that each individual associated with the filing and prosecution of a patent application has "a duty to disclose to the Office all information known to that individual to be material to patentability as defined in this section." A proper interpretation of the terms and conditions of such a statement – such as the meaning of the term "material" – would draw into consideration the other parts of the rule. The Patent Office is therefore respectfully requested to remove the objection to the declaration. Alternatively, insofar as the Patent Office continues to assert that the original declaration departs from the suggested model declaration in matters of form, it has the authority to waive such deviations; the Patent Office is respectfully requested to exercise that authority and waive such minor deviations from the suggested model declaration.

1 *Regarding the Objections to the Drawings*

2 The Office Action objected to Figs. 1-3 because, according to the Office Action,
3 these figures should be labeled as PRIOR ART. However, Applicant submits that these
4 figures, even in their original form, do not represent the prior art. Therefore, it would be
5 inappropriate to label these figures as prior art. Nevertheless, to clarify the non-prior art
6 status of these figures, these figures have been amended herein to clarify their nexus to
7 the internationalization functionality illustrated in later figures. Namely, in Fig. 1, the
8 label "Multi-Layer Application/Domain Architecture" (in functional box 110) has been
9 changed to "International-Enabled Multi-Layer Application/Domain Architecture." In
10 Fig. 2, the label "Multi-Layer Architecture" (in functionality box 110) has been changed
11 to "International-Enabled Multi-Layer Architecture." In Fig. 3, the title "General
12 Operation" has been changed to "General Operation of International-Enabled Multi-
13 Layer Architecture." Exemplary support for these changes can be found at least on page
14 17, line 27 *et seq.* of the specification. In view of the above changes, Applicant submits
15 that the drawings comply with the applicable statutes and rules. Applicant accordingly
16 requests the Patent Office to remove the objection to the drawings.

17 *Regarding the Objections to the Speciation*

18 The Office Action requested that the specification be reviewed to ensure that it
19 properly cites trademarked technology. A number of changes have been made in this
20 Amendment to comply with the Office Action's request. The Applicant submits that the
21 specification complies with the applicable statutes and rules. Applicant accordingly
22 requests the Patent Office to remove the objection to the specification.

23 *35 U.S.C. § 102 and 35 U.S.C. § 103 Rejections*

24 Claims 1-5, 13-15, 18-24, 26-36, 45-47, 49, 51-54 and 56 were rejected under 35
25 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,678,039 to Hinks et al.

1 (referred to below as “Hinks”). Claims 7, 8, 10 and 12 were rejected under 35 U.S.C. §
2 102(b) as being anticipated by the publication “OpenWindows Developer’s Guide:
3 Xview Code Generator Programmer’s Guide,” by Sun Microsystems (referred to below
4 as “Sun”). Claims 6, 16, 17, 25, 37, 38, 41-44, 48, 50 and 55 were rejected under 35
5 U.S.C. § 103 as being unpatentable over Hicks in view of Sun. Claim 9 was rejected
6 under 35 U.S.C. § 103 as being unpatentable over Sun in view of U.S. Published Patent
7 Application No. 2002/0107684 to Gao (referred to as “Gao” below). Claim 11 was
8 rejected under 35 U.S.C. § 103 as being unpatentable over Sun in view of Hinks. And,
9 finally, claims 39 and 40 were rejected under 35 U.S.C. § 103 as being unpatentable over
10 Hinks in view of Gao. Applicant respectfully traverses each of these rejections for the
11 reasons stated below. As amendments have been made to each of the pending
12 independent claims, the rejections will be addressed *en bloc* to facilitate the Patent
13 Office’s review of the case.

14 As amended, independent claim 1 recites a computer-implemented method
15 comprising: analyzing a computer-servable document written for a particular locale;
16 *extracting and removing* locale-sensitive content from the document while leaving locale-
17 independent elements in the document; storing the locale-sensitive content in a data
18 structure separate from the document; and *substituting, in a same operation as the*
19 *extracting and removing, a function call in place of associated removed locale-sensitive*
20 *content in the document*, the function call being configured such that, when executed, the
21 function call obtains the locale-sensitive content from the data structure.

22 None of the applied documents disclose the above combination of features,
23 whether considered alone or in any combination. Each applied document will be
24 discussed below, followed by an explanation of representative deficiencies of these
25 documents vis-à-vis claim 1.

1 Hinks discloses a technique for translating software into localized versions. With
2 reference primarily to Fig. 3, Hinks' technique involves obtaining a resource file 325
3 from original source files 313 or from an original program 317. An EXPIMP
4 (Export/Import Resource Parser) module 330 parses the resource file 325 into a
5 Translation Table 340, which can be stored as a database table. The Translation Table
6 340 encapsulates all of the information that is known or can be derived from the various
7 resources, and stores information in a format which may be utilized by various editors
8 350. Note generally column 7, line 53 to column 8, line 13 of Hinks, as well as Figs. 6B
9 and 11, which illustrate the Translation Table 340. More specifically, certain information
10 in the Translation Table 340 is earmarked as translatable, and a user may use the editors
11 350 to translate such information. See, for instance, column 11, line 37 *et seq.* The
12 translations can then be stored in the Translation Table 340. The EXPIMP module 340
13 can then produce a translated resource file 360, and the target product can be rebuilt
14 based on this information. See generally column 8, lines 6-37.

15 Sun describes tools for internationalizing software programs. In the technique
16 described by Sun, a Devguide tool or a developer inserts gettext() function calls around
17 all user-visible text in an application. See page 99 of Sun, and also the samples on page
18 98. An xgettext operation can then be run on the source fields to produce a portable
19 object file. See page 99 of Sun. The portable object file contains the native language
20 strings taken from a program and placeholders for a localizer to supply each string's
21 translation. See page 97. These portable object files can be shipped to localizers for
22 translation into local languages. See page 98. The translated object files can be
23 subsequently used to adapt a software program to another locale.

24 Finally, Gao describes a technique for globalizing software. The technique parses
25 software or website code to separate it into a file of international code (which is not

1 locale dependent) and a resource pack of items specific to a first locale. The
2 internationalization process includes an analysis of the original code to identify its
3 structure. Based on that analysis, the technique identifies potential items which contain
4 information for insertion into the resource pack. See page 1, paragraph No. 5 to
5 paragraph No. 7 of Gao.

6 None of the above documents describes *extracting and removing* locale-sensitive
7 content from the document while leaving locale-independent elements in the document,
8 storing the locale-sensitive content in a data structure separate from the document, and
9 *substituting, in a same operation as the extracting and removing, a function call in place*
10 *of associated removed locale-sensitive content in the document*. For instance, Hinks does
11 not substitute a function call in place of associated removed locale-sensitive content.
12 Namely, Hinks forms the Translation Table 340 from a program, translates any
13 translatable content using editors 350, and then rejoins the translated content back to the
14 program. The Examiner acknowledges the deficiencies of Hinks by stating that “Hinks
15 does not expressly disclose the substitution of a locale-sensitive content with a function
16 call” (e.g., page 15 of the Office Action). But the deficiency is more than a lack of
17 “express” disclosure, but also a failure of Hinks to even remotely suggest this feature.
18 Hinks uses a procedure of extraction, translation, and reinsertion that has no use of
19 function calls. The Gao reference is likewise deficient in that it does not disclose,
20 suggest, or even hint at the use of function calls in the manner claimed.

21 The Office Action relies on the Sun reference to make up for the shortcomings of
22 Hinks and Gao. However, Sun uses function calls in a manner which is significantly
23 different than the way the method of claim 1 uses function calls. First, in Sun, the
24 gettext() function is added so that it *wraps around* existing locale-sensitive content. For
25 example, if an application contained a message, “Please type your login ID,” then the

1 gettext() procedure might transform this statement as follows: gettext("Please type your
2 login ID"). This is inferred on page 99 of Sun when it says that gettext() function calls
3 are inserted "*around* all user-visible text in an application" (emphasis added). This
4 means that function calls do not *remove* the locale-sensitive content as claimed; rather, at
5 best, the functions *supplement* the locale-sensitive content.

6 Second, after the gettext() function calls have been inserted around the text in a
7 program, Sun runs a separate utility, the xgettext() operation, to create the portable file
8 containing the locale-sensitive content. This means that Sun does not substitute the
9 gettext() function in a *same operation* as an extraction procedure, but as a *preliminary*
10 step in order to *subsequently* perform the extraction procedure as a *separate operation*.
11 Sun's procedure is therefore markedly different than the method recited in claim 1, which
12 calls for *substituting, in a same operation as the extracting and removing, a function call*
13 *in place of associated removed locale-sensitive content in the document*. Exemplary
14 support for this amendment to claim 1 can be found in Fig. 5 of the present application,
15 which shows that, when processing a line of code, a storage step 510 and a substitution
16 step 512 are performed as part of a single extraction operation 508.

17 The claimed technique has potential advantages over that of Hinks. For example,
18 extracting and removing locale-sensitive content produces a more generic document,
19 which is in better accord with the end objective of internationalization and subsequent
20 localization. Also, the claimed invention need not resort to a separate utility to extract
21 locale-sensitive content, and therefore is potentially easier to use.

22 For at least the above-identified reasons, the Applicant submits that claim 1 is
23 neither disclosed nor rendered obvious by any combination of Hinks, Sun and Gao. The
24 other pending independent claims (i.e., claims 7, 13, 20, 32, 41, 49 and 55) have been
25 amended in this Response in a manner that is related to that of claim 1. Accordingly,

1 these independent claims are allowable over any combination of Hinks, Sun and Gao for
2 reasons similar to those given for claim 1. The dependent claims are allowable at least by
3 virtue of their dependency on their respective independent claims.

4 For at least the above-stated reasons, the Applicant respectfully requests the
5 withdrawal of the 35 U.S.C. § 102 and 35 U.S.C. § 103 rejections.

6 *Conclusion*

7 The arguments presented above are not exhaustive; Applicant reserves the right to
8 present additional arguments to fortify its position. Further, Applicant reserves the right
9 to challenge the alleged prior art status of one or more documents cited in the Office
10 Action, and particularly the Gao reference.

11 All objections and rejections raised in the Office Action having been addressed, it
12 is respectfully submitted that the present application is in condition for allowance and
13 such allowance is respectfully solicited. The Examiner is urged to contact the
14 undersigned if any issues remain unresolved by this Amendment.

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16
17 Respectfully Submitted,

18 Dated: July 16, 2004

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1/7

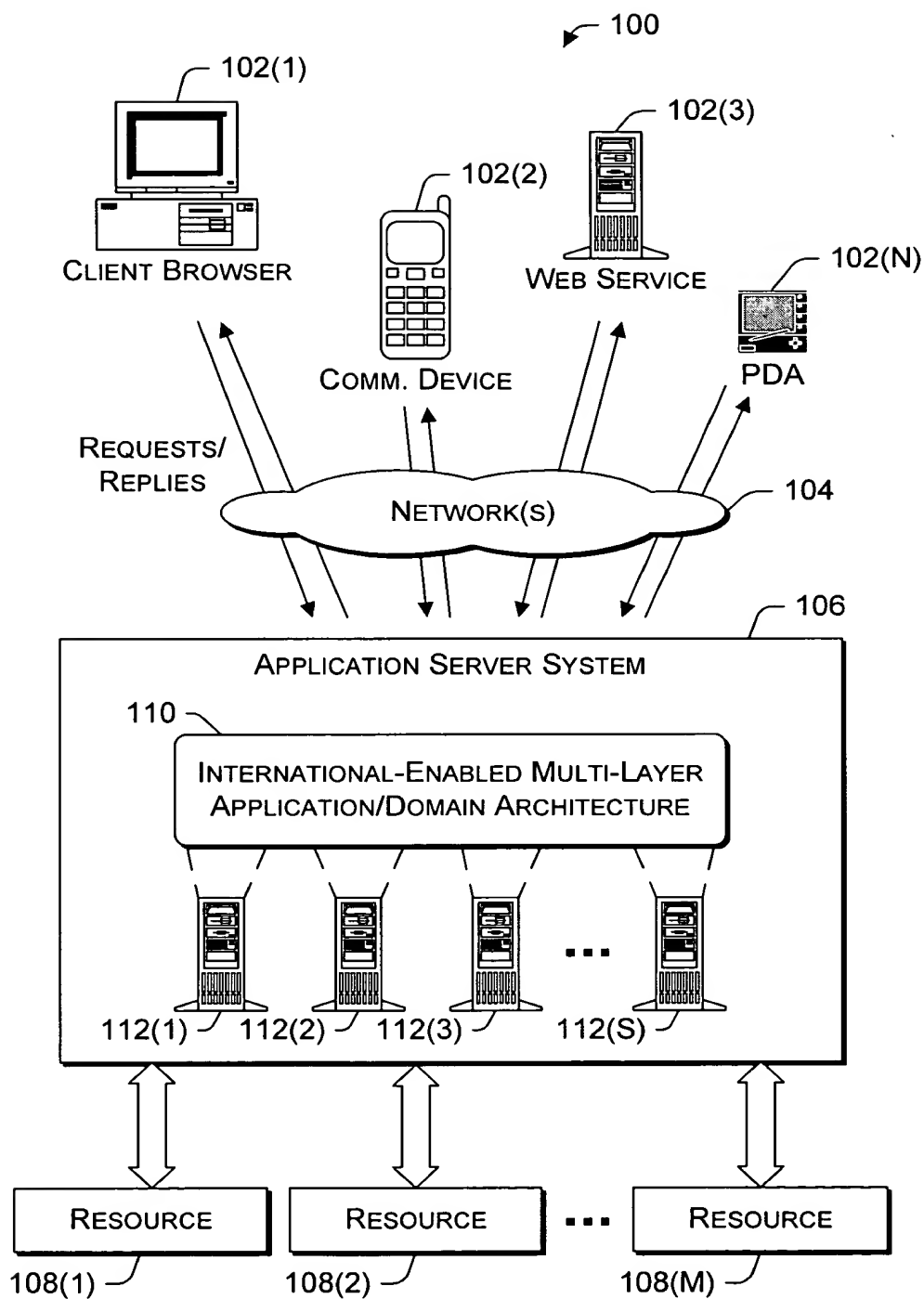


Fig. 1

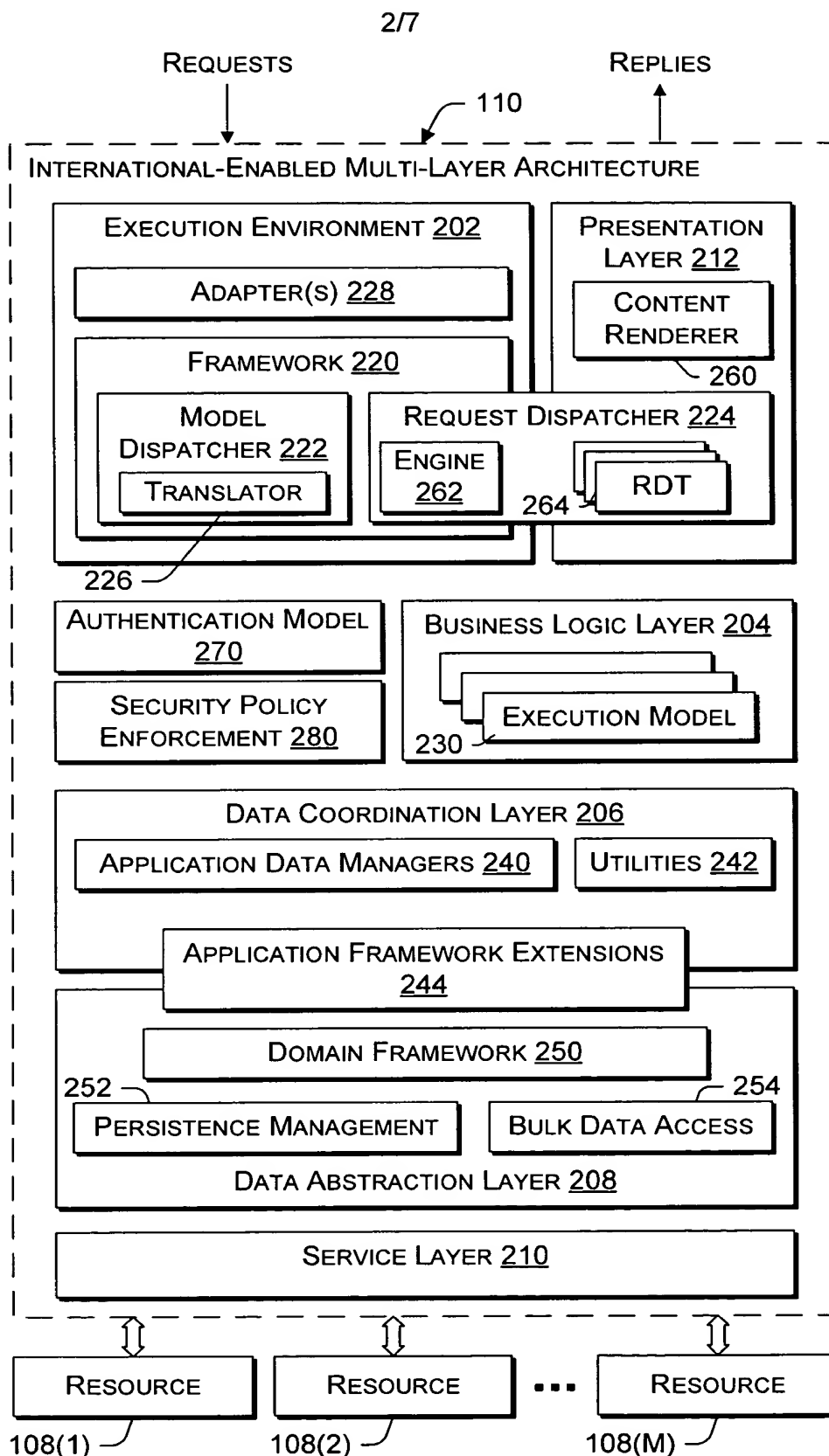


Fig. 2

3/7



GENERAL OPERATION OF INTERNATIONAL-ENABLED MULTI-LAYER ARCHITECTURE

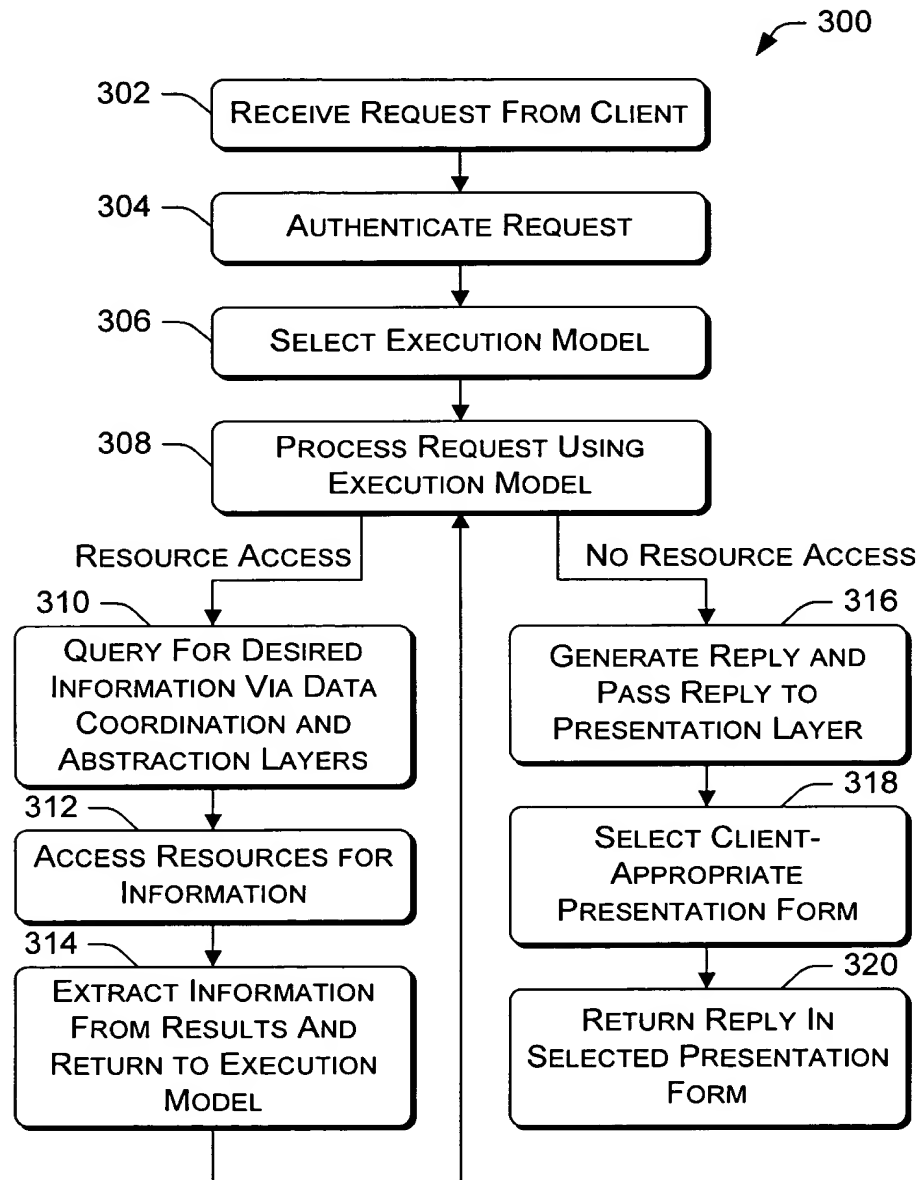


Fig. 3